

## Claim Form

In the HIGH COURT OF JUSTICE  
Chancery Division  
The Rolls Building

Fee Account  
no.

Help with Fees  
– Ref. no. (if  
applicable)

H W F - -

12 May 2017  
HC-2017-001383

You may be able to issue your claim online  
which may save time and money. Go to  
[www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.

	For court use only
Claim no.	
Issue date	

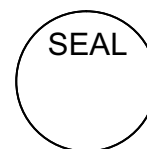
Claimant(s) name(s) and address(es) including postcode

Vadim Maratovich Shulman  
11, Avenue JF Kennedy  
Monaco  
98000

Defendant(s) name and address(es) including postcode

(1) Igor Valeryevich Kolomoisky  
Quai Wilson 39  
1201 Geneva  
Switzerland

(2) Gennadiy Borisovich Bogolyubov  
31 Belgrave Square  
London  
SW1X 8QB



Brief details of claim

The Claimant claims:

- (1) A declaration that an agreement made between the Claimant and the Defendants in 1999 / 2000 jointly to enter into investments and/or manage assets (the "Agreement") constituted or gave rise to a partnership between the Claimant and the Defendants (the "Partnership");
- (2) A declaration that the Partnership was dissolved as from October 2013, further or alternatively an order that the Partnership be dissolved;
- (3) An order that the affairs of the Partnership be wound up;
- (4) Further or alternatively, a declaration that the Agreement constituted a joint venture between the Claimant and the Defendants pursuant to which and/or as implied terms of which the Defendants owed the Claimant fiduciary duties including a duty of loyalty and a duty to account;
- (5) All necessary accounts and enquiries be taken and made, in particular but not exclusively as to:
  - a. the profits generated by the parties' joint investments and business dealings, the Defendants' dealings with those profits and other partnership assets, and the sums due to the Claimant;
  - b. the monies and/or Sponsored Global Depository Receipts owed to the Claimant for the sale of the Claimant's interests in several assets located in Ukraine to Evraz plc, including the sum of \$30 million alleged to have been invested by the Defendants on the Claimant's behalf, and the Defendants' dealing with that sum;
  - c. the investment in and the Defendants' dealings with a steel plant located in Warren, Ohio;
- (6) An order for payment by the Defendants to the Claimant of any sums found due on taking such an account or accounts and interest on those sums;
- (7) Further or alternatively, a declaration that the Defendants hold all assets (or rights to hold such assets) acquired pursuant to the Agreement or otherwise and/or the proceeds of the same on trust for the Claimant;
- (8) An enquiry be made as to what assets are held on trust by the Defendants for the Claimant;
- (9) A proprietary injunction restraining dealings with the Claimant's property and/or any assets derived therefrom and/or delivery up of the same;
- (10) Further or alternatively, restitution of all the sums and assets by which the Defendants have been unjustly enriched at the Claimant's expense;
- (11) Further or alternatively, damages and/or equitable compensation for the losses incurred as a result of the Defendants' breaches of fiduciary duty and breaches of the Agreement;
- (12) Interest on all sums found due to the Claimant at the compounded rate of 7% per annum as agreed between the Claimant and the Defendants, and/or compound interest in equity and/or interest pursuant to section 35A of the Senior Courts Act 1981 and/or pursuant to section 42 of the Act on all sums found due to the Claimant compounded at such rate and for such period as the Court thinks fit;
- (13) Costs; and

(14) Further or other relief.

Value

More than £200,000

You must indicate your preferred County Court Hearing Centre for hearings here (*see notes for guidance*)

High Court of Justice, Chancery Division, the Rolls Building

Defendant's  
name and  
address for  
service  
including  
postcode

(1) Igor Valeryevich Kolomoisky  
Quai Wilson 39  
1201 Geneva  
Switzerland

(2) Gennadiy Borisovich  
Bogolyubov  
31 Belgrave Square  
London, SW1X 8QB

£	
Amount claimed	To be assessed
Court fee	£10,528
Legal representative's costs	To be assessed
<b>Total amount</b>	<b>To be assessed</b>

<b>Claim No.</b>	
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Does, or will, your claim include any issues under the Human Rights Act 1998?    ☐ Yes ☒ No

Particulars of Claim attached.

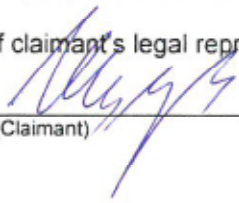
**Statement of Truth**

\*(I believe)~~(The Claimant believes)~~ that the facts stated in these particulars of claim are true.

\*~~I am duly authorised by the claimant to sign this statement~~

Full name Vadim Maratovich Shulman

Name of claimant's legal representative's firm Hogan Lovells International LLP

signed  position or office held \_\_\_\_\_  
\*(Claimant) (if signing on behalf of firm or company)

*\*delete as appropriate*

FAO: Alex Sciannaca  
Hogan Lovells International LLP  
Atlantic House  
Holborn Viaduct  
London EC1A 2FG  
REF: D1/ACS/D3/LH/161370.000001

Claimant's or claimant's legal  
representative's address to which  
documents or payments should be  
sent if different from overleaf including  
(if appropriate) details of DX, fax or e-  
mail.